

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|-----------------------|---|-----------------------|
| DON LIPPERT, et al., |) | |
| |) | |
| Plaintiffs, |) | No. 10-cv-4603 |
| v. |) | |
| |) | Judge Jorge L. Alonso |
| ROB JEFFREYS, et al., |) | |
| |) | |
| Defendants. |) | |

PLAINTIFFS' MOTION FOR LEAVE TO FILE EXHIBIT UNDER SEAL

Plaintiffs respectfully move this Court, pursuant to Local Rule 26.2, for leave to file under seal a compilation of excerpts from the Court-appointed Monitor's Fifth Report attached hereto as Exhibit 1, and in support state as follows:

1. Exhibit 1 is a compilation of excerpts from the Court-appointed Monitor's Fifth Report concerning the Monitor's comments on Defendants' proposed Implementation Plan drafts and whether those comments have been addressed by Defendants; it is Exhibit 1 to Plaintiffs' Reply in Support of Motion for Finding of Contempt and Entry of Plan.

2. Within the 30-day period provided by the Decree for parties' responses to the Monitor about the Monitor's semi-annual reports on compliance, Defendants objected to certain statements in the Fifth Report mortality review appendix and the Monitor is making minor emendations, as Plaintiffs understand it, to the Fifth Report. None of the statements about the Implementation Plan drafts in Exhibit 1 directly implicate any of this objected-to material, but for these reasons the Fifth Report has not yet been filed in the public record, and in an abundance of caution Plaintiffs seek to file this compilation under seal.

WHEREFORE, Plaintiffs request that the Court grant Plaintiffs' motion for leave to file under seal the compilation of excerpts from the Court-appointed Monitor's Fifth Report attached

hereto as Exhibit 1, which is Exhibit 1 to Plaintiffs' Reply in Support of Motion for Finding of Contempt and Entry of Plan.

Dated: July 27, 2022

Respectfully submitted,

By: /s/ Camille E. Bennett
One of Plaintiffs' attorneys

Alan Mills
Nicole R. Schult
Uptown People's Law Center
4413 North Sheridan
Chicago, IL 60640

Camille E. Bennett
Joshua Blecher-Cohen
Roger Baldwin Foundation of ACLU, Inc.
150 N. Michigan Ave., Ste. 600
Chicago, IL 60601

Harold C. Hirshman
Samantha Reed
Dentons US LLP
233 S. Wacker Drive, Ste. 5900
Chicago, IL 60606